



**Air Quality  
TIER II OPERATING PERMIT  
and  
PERMIT TO CONSTRUCT**

**State of Idaho  
Department of Environmental Quality**

**PERMIT No.:** T2-2008.0109

**FACILITY ID No.:** 065-00008

**AQCR:** 61

**CLASS:** A

**SIC:** 2034

**ZONE:** 12

**UTM COORDINATE (km):** 437.0 , 4854.0

**1. PERMITTEE**

Rexburg Facility of Basic American Foods – a Division of Basic American, Inc.

**2. PROJECT**

Facility-wide Tier II Operating Permit and Permit to Construct

**3. MAILING ADDRESS**

40 East 7th North

**CITY**

Rexburg

**STATE**

Idaho

**ZIP**

83440

**4. FACILITY CONTACT**

Deloris Aguilar

**TITLE**

Environmental Superintendent

**TELEPHONE**

(208) 785-8306

**5. RESPONSIBLE OFFICIAL**

Joe Milligan

**TITLE**

Facility Manager

**TELEPHONE**

(208) 359-6820

**6. EXACT PLANT LOCATION**

40 East 7th North, Rexburg

**COUNTY**

Madison

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Dehydrated Food Products and Animal Feed

**8. PERMIT AUTHORITY**

This permit to construct and Tier II operating permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228 and IDAPA 58.01.01.400 through 470, respectively. This permit pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

Only the terms and conditions pertaining to Tier II operating permit requirements are subject to the expiration date of this permit.

The permit to construct conditions in this permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.

**ZACH KLOTOVICH, PERMIT WRITER**

**DEPARTMENT OF ENVIRONMENTAL QUALITY**

**MIKE SIMON, STATIONARY SOURCE PROGRAM MANAGER**

**DEPARTMENT OF ENVIRONMENTAL QUALITY**

**DATE ISSUED:**

June 10, 2008

**DATE MODIFIED/REVISED:**

**XXXXX**

**DATE EXPIRES:**

June 10, 2013

## Table of Contents

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE .....	3
1. PERMIT SCOPE.....	4
2. FACILITY-WIDE CONDITIONS .....	6
3. KIPPER BOILER .....	7
4. BOILERS 1 AND 2 .....	15
5. PROCESS A (DRYING PROCESS AND MATERIAL TRANSFER SYSTEMS).....	16
6. PROCESS B (DRYING PROCESS AND MATERIAL TRANSFER SYSTEMS).....	19
7. PLANT SPACE HEATERS .....	21
8. CARBON MONOXIDE EMISSIONS LIMIT .....	22
9. SUMMARY OF EMISSION RATE LIMITS .....	24
10. PERMIT TO CONSTRUCT AND TIER II PERMIT TO OPERATE GENERAL PROVISIONS .....	25

## Acronyms, Units, and Chemical Nomenclature

acfm	actual cubic feet per minute
AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
Btu	British thermal unit
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
HAPs	Hazardous Air Pollutants
IDAPA	A numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pounds per hour
m	meter(s)
MMBtu	Million British thermal units
NO <sub>2</sub>	nitrogen dioxide
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
PM	Particulate Matter
PM <sub>10</sub>	Particulate Matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppmv	parts per million by volume
PTC	Permit to Construct
PTE	Potential to Emit
<i>Rules</i>	<i>Rules for the Control of Air Pollution in Idaho</i>
scf	standard cubic feet
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO <sub>2</sub>	sulfur dioxide
SO <sub>x</sub>	sulfur oxides
T/yr	Tons per year
µg/m <sup>3</sup>	micrograms per cubic meter
UTM	Universal Transverse Mercator
VOC	volatile organic compound

# AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-2008.0109

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No.:</b>	065-00008	<b>Date Issued:</b>	June 10, 2008
<b>Location:</b>	Rexburg, ID	<b>Date Expires:</b>	June 10, 2013		

## 1. PERMIT SCOPE

### *Purpose*

1.1 This is a Tier II operating permit and Permit to Construct (PTC) for the Rexburg facility of Basic American Foods (BAF). This permit includes existing requirements for the facility's Kipper boiler, and it also satisfies the PTC requirements for new or modified sources that potentially required a PTC, but for which a PTC was not obtained prior to construction. Those sources include:

- 1976, Installation of dryer and stacks 613/614, 615/616, and 638
- 1989, Installation of process cooler and stack 7020
- 1993, Installation of dryers and stacks 5034 and 5037
- 1994, Replacement of dryer associated with stack 7019
- 1997, Installation of dryer and stack 4000
- 1999, Replacement of dryer and installation of stacks 228 and 234

1.2 The PTC portion of this permit incorporates and replaces the following permit(s), the terms and conditions of which shall no longer apply:

- PTC Letter issued on July 30, 1980, and the PTC amendments issued on April 30, 1981, and May 8, 1984, to the American Potato Company for the Kipper boiler.
- T2-030515, issued June 10, 2008

The portions of this permit that are PTC provisions are identified as such in the authority citations for those provisions.

1.3 This permit also establishes limits to maintain compliance with the National Ambient Air Quality Standards (NAAQS) and to keep the facility's potential to emit below the Prevention of Significant Deterioration (PSD) threshold.

### *Regulated Sources*

1.4 Table 1.1 lists all sources of regulated emissions in this permit.

**Table 1.1 SUMMARY OF REGULATED SOURCES**

Permit Section	Source Description	Emissions Control Device	Emission Unit/Stack Id
3	Kipper & Sons boiler	Multiclone, Wet Scrubber	Kipper boiler
4	Boiler 1	None	Boiler 1
	Boiler 2	None	Boiler 2
<b>PROCESS A</b>			
5	Cooler/Dryer 7020 (Cooler vent)	None	7020
	Cooler/Dryer 7101 (Dryer, 6.5 MMBtu/hr, natural gas-fired)	None	7101
	Cooler/Dryer 7102 (Dryer, 6.5 MMBtu/hr, natural gas-fired)	None	7102
	Cooler/Dryer 7019 (Dryer, 6.6 MMBtu/hr, steam and natural gas)	None	7019
	Cooler/Dryer 7001 (Dryer, steam-heated)	None	7001
	Cooler/Dryer 7027 (Cooler)	None	7027
	Material Recovery Unit 7006	None	7006
<b>PROCESS B</b>			
6	Material Recovery Unit 5034	None	5034

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-2008.0109**

<b>Permittee:</b> Basic American Foods	<b>Facility ID No.:</b> 065-00008	<b>Date Issued:</b> June 10, 2008
<b>Location:</b> Rexburg, ID		<b>Date Expires:</b> June 10, 2013

Permit Section	Source Description	Emissions Control Device	Emission Unit/Stack Id
6	Cooler/Dryer 5037 (Cooler/dryer vent, dryer is steam heated)	None	5037
	Cooler/Dryer 4000 (Dryer, steam heated)	None	4000
	Cooler/Dryer 228 (Dryer, natural gas-fired, 16.1 MMBtu/hr)	None	228
	Cooler/Dryer 234 (Second exhaust from dryer 228)	None	234
	Cooler/Dryer 410/411 (Dryer vent, steam-heated)	None	410/411
	Cooler/Dryer 311, 312 (Dryer vent, steam-heated)	None	311, 312
	Cooler/Dryer 638 (Dryer vent, steam-heated)	None	638
	Cooler/Dryer 613/614 (Dryer vent, steam heated)	None	613/614
	Cooler/Dryer 615/616 (Dryer vent, steam heated)	None	615/616
	Material Recovery Unit 707 (fabric filter)	None	707
	Material Recovery Unit 725 (fabric filter)	None	725
	Material Recovery Unit 8 (fabric filter)	None	8
	Material Recovery Unit 5001	None	5001
	Material Recovery Unit 5000 (fabric filter)	None	5000
	Material Recovery Unit 432 (fabric filter)	None	432
	Material Recovery Unit 322	None	322
	Material Recovery Unit 572 (Vent from material recovery cyclone in animal feed load-out system)	None	572
7	Plant Space Heaters	None	Various

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-2008.0109			
<b>Permittee:</b>	Basic American Foods	<b>Facility ID No.:</b> 065-00008	<b>Date Issued:</b> June 10, 2008
<b>Location:</b>	Rexburg, ID		<b>Date Expires:</b> June 10, 2013

## 2. FACILITY-WIDE CONDITIONS

Reserved. (The Tier I operating permit contains facility-wide conditions that apply to this facility.)

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-2008.0109**

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No.:</b>	065-00008	<b>Date Issued:</b>	June 10, 2008
<b>Location:</b>	Rexburg, ID	<b>Date Expires:</b>	June 10, 2013		

**3. KIPPER BOILER****3.1 Process Description**

The Kipper boiler is a wood and coal-fired boiler with an original steam production rating of 60,000 pounds per hour. The boiler can burn up to 39% coal on a fuel weight basis (i.e. 50% of the heating value). The Kipper boiler was installed in 1981, and an economizer was added in 2001, increasing the maximum steam production rate to 65,000 lb/hr. Emission controls on the Kipper boiler include a Zurn multiclone dust collector and a Riley Ventri-Rod<sup>®</sup> scrubber.

Table 3.1 describes the devices used to control emissions from the Kipper boiler.

**Table 3.1 EMISSIONS UNIT AND EMISSIONS CONTROL DEVICE**

<b>Emissions Unit / Process</b>	<b>Emissions Control Device</b>
Kipper boiler	Zurn multiclone and Riley Ventri-rod <sup>®</sup> scrubber

***Emissions Limits*****3.2 PM<sub>10</sub> Emissions Limits**

Emissions of particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers (PM<sub>10</sub>) from the Kipper boiler stack shall not exceed 16.3 pounds per hour (24-hour average) and 71.2 tons per any consecutive 12-month period.

**[PTC Condition; IDAPA 58.01.01.203.01, 5/1/94; IDAPA 58.01.01.211.01, 5/1/94]**

**3.3 SO<sub>2</sub> Emissions Limit**

Emissions of sulfur dioxide (SO<sub>2</sub>) from the Kipper boiler stack shall not exceed 214 tons per any consecutive 12-month period.

**[PTC Condition; IDAPA 58.01.01.203.01, 5/1/94; IDAPA 58.01.01.211.01, 5/1/94]**

**3.4 Fuel Burning Equipment - PM**

3.4.1 Particulate matter emissions from the Kipper boiler shall not exceed 0.080 gr/dscf corrected to 8% oxygen when burning wood fuel.

3.4.2 Particulate matter emissions from the Kipper boiler shall not exceed 0.050 gr/dscf corrected to 8% oxygen when burning coal.

3.4.3 When two or more types of fuel are burned concurrently, the allowable emissions shall be determined by proportioning the gross heat input and emissions standards for each fuel. The proportional heat input shall be determined in accordance with Permit Condition 3.11.

**[PTC Letter, 7/30/80; IDAPA 58.01.01.675, 4/5/00]**

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-2008.0109**

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No.:</b>	065-00008	<b>Date Issued:</b>	June 10, 2008
<b>Location:</b>	Rexburg, ID	<b>Date Expires:</b>	June 10, 2013		

***Operating Requirements*****3.5 Kipper Boiler Fuel Types**

The permittee may combust only wood or a wood-coal mixture in the Kipper boiler. The Kipper boiler may be fired using coal up to 50% of the heat input on a 24-hour average.

**[PTC Letter, 7/30/80 (amended 5/8/84); IDAPA 58.01.01.211.01, 5/1/94]**

**3.6 Coal Requirements**

3.6.1 The sulfur content of the coal used in the Kipper boiler shall not exceed 1.0 % by weight.

3.6.2 The total quantity of coal combusted in the Kipper boiler shall not exceed 57 tons per day and 12,228 tons per any consecutive 12-month period.

**[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94; IDAPA 58.01.01.729, 5/1/94]**

**3.7 Steam Production**

3.7.1 The Kipper boiler steam production rate shall not exceed 65,000 pounds of steam per hour on a 24-hour rolling average.

**[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]**

**3.8 Ventri-Rod® Scrubber and Multiclone**

The permittee shall install, maintain, and operate a multiclone and a wet scrubber on the Kipper boiler to control the emissions of PM and PM<sub>10</sub>.

**[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]**

**3.9 Operations Manual – Fuel Monitoring**

Prior to combusting coal in the Kipper boiler, the permittee shall have developed a fuel monitoring operations manual for measuring the total tons of coal fed to the boiler on a daily basis. At a minimum the manual shall include a description of the equipment and the procedures/methods that will be used to measure the amount of coal fed to the boiler. A copy of the initial fuel monitoring operations manual, and any subsequent revisions, shall be maintained onsite and a copy shall be submitted to DEQ.

**[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]**

**3.10 Boiler Annual Inspection and Maintenance**

At least once per calendar year, the permittee shall inspect the internal workings of the Kipper boiler and perform any maintenance required to maintain efficient combustion. The permittee shall maintain records of the boiler maintenance conducted to comply with this Permit Condition. The records shall provide the date the inspection was conducted and a description of the maintenance performed on the boiler to maintain combustion efficiency.

**[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]**



**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-2008.0109**

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No.:</b>	065-00008	<b>Date Issued:</b>	June 10, 2008
<b>Location:</b>	Rexburg, ID	<b>Date Expires:</b>	June 10, 2013		

***Monitoring and Recordkeeping Requirements*****3.11 Steam and Coal Monitoring**

- 3.11.1 The steam produced in the boiler shall be monitored and recorded at least once per hour in units of pounds of steam per hour and average pounds of steam per hour per rolling 24-hour period.
- 3.11.2 The weight of coal combusted in the Kipper boiler shall be monitored and recorded on a daily basis in units of tons per day. The weight of coal combusted in the Kipper boiler shall be monitored and recorded on a monthly basis in units of tons per month and tons per rolling 12-month period.
- 3.11.3 The amount of heat input from coal shall be determined by multiplying the weight of coal fed to the boiler by 19 MMBtu/ton (9500 Btu/lb).
- 3.11.4 The total amount of heat input to the Kipper boiler shall be determined by multiplying the hourly steam production rate (lbs steam per hour) by the steam heat content (1,000 Btu/lb) and the boiler efficiency (0.725) to determine the heat input required to produce that amount of steam.
- 3.11.5 The amount of heat input from wood shall be determined by subtracting the amount of heat input from coal (Btu/hr) from the total amount of heat input to the boiler (Btu/hr).

**[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]**

**3.12 Fuel Receipts**

For each shipment of coal received, the permittee shall obtain and maintain records of the following information that specifies the sulfur content by weight of the shipment received:

- Fuel receipts from the fuel supplier; or
- Representative samples and laboratory analysis documentation.

**[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]**

**3.13 40 CFR 64.6 – Approved CAM Monitoring**

The permittee shall assure compliance with the particulate matter permit limits and standards for the Kipper boiler by conducting the approved monitoring and recordkeeping in Table 3.2.

**[40 CFR 64.6]**

# AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-2008.0109

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No.:</b>	065-00008	<b>Date Issued:</b>	June 10, 2008
<b>Location:</b>	Rexburg, ID	<b>Date Expires:</b>	June 10, 2013		

**Table 3.2 COMPLIANCE ASSURANCE MONITORING REQUIREMENTS FOR THE KIPPER BOILER**

	Indicator No.1	Indicator No.2	Indicator No.3	Indicator No.4	Indicator No. 5
<b>I. Indicator</b>	Boiler Steaming Rate	Multiclone pressure drop	Scrubber downstream static pressure	Scrubber water pressure	Combination of firebox static pressure and induced draft fan speed setting
<b>Measurement Approach</b>	The boiler steaming rate is measured using a pressure and temperature compensated orifice plate that is located in the steam header. Data acquisition system monitors pressure drop across the plate, steam temperature, and steam pressure and calculates steam rate from these parameters.	The multiclone pressure drop is measured by digital pressure gauges located upstream and downstream of the multiclones. Pressure drop is determined by the difference in reading between the gauges and is displayed in the boiler control room.	The scrubber downstream static pressure is measured using a digital pressure gauge in the scrubber throat downstream of the scrubber rods.	The scrubber water pressure is measured using a manual pressure gauge located in the scrubber water supply header. Scrubber water pressure is determined by direct observation of the gauge.	The firebox static pressure is measured using a digital pressure gauge tapped into the firebox. The induced draft fan speed setting is measured directly from the speed control setting for the fan.
<b>II. Indicator Range</b>	An excursion is defined as a boiler steaming rate less than 35,000 lbs/hr or greater than 65,000 lbs/hr.	An excursion is defined as a multiclone pressure drop less than 1.0 inches of water or greater than 6.0 inches of water.	An excursion is defined as a scrubber downstream static pressure that is less than 5.6 inches of water column.	An excursion is defined as a scrubber water pressure less than 4.0 psig or greater than 10 psig.	An excursion is defined as any time the induced draft fan goes to 100% speed and is unable to maintain a negative pressure in the firebox.
<b>III. Performance Criteria</b>					
<b>A. Data Representativeness</b>	The boiler steaming rate sensor is located in the steam header.	The multiclone pressure drop monitors are located upstream and downstream of the multiclones. The sensitivity is $\pm 0.1$ in. H <sub>2</sub> O.	The scrubber downstream static pressure monitor is located downstream of the scrubber rods. The sensitivity is $\pm 0.1$ in. H <sub>2</sub> O.	The scrubber water pressure monitor is located in the water supply header. The gauge can be read to $\pm 0.5$ psig.	The firebox static pressure monitor is tapped into the firebox. The sensitivity is 0.01 inches of water column. The fan speed is recorded directly from the boiler control system and is recorded to the nearest 0.1 %.
<b>B. Verification of Operational Status</b>	n/a	n/a	n/a	n/a	n/a
<b>C. QA/QC Practices and Criteria</b>	The steam recorder was calibrated when installed. The orifice plate will be inspected every other year for physical condition and BAF will check the overall health of the transmitter system by conducting span checks.	Digital pressure drop monitors have very little tendency to drift and calibration is not needed. <sup>2</sup> The performance of the transmitters will be checked every other year and will include conducting span checks of the entire loop.	Digital pressure drop monitors have very little tendency to drift and calibration is not needed. <sup>2</sup> The performance of the transmitter will be checked every other year and will include conducting span checks of the entire loop.	The pressure gauge reading will be compared with a second manual pressure gauge monthly. If readings differ by more than 1 psig, troubleshooting will be initiated.	Digital pressure drop monitors have very little tendency to drift and calibration is not needed. The performance of the transmitters will be checked every other year and will include conducting span checks of the entire loop. The induced draft fan speed setting does not require a calibration.
<b>D. Monitoring Frequency</b>	The boiler steam production is totaled continuously and recorded hourly.	Recorded every 2 hours.	Recorded every 2 hours.	Recorded every 2 hours.	Recorded every two hours.

# AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-2008.0109

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No.:</b>	065-00008	<b>Date Issued:</b>	June 10, 2008
<b>Location:</b>	Rexburg, ID	<b>Date Expires:</b>	June 10, 2013		

	Indicator No.1	Indicator No.2	Indicator No.3	Indicator No.4	Indicator No. 5
I. Indicator	Boiler Steaming Rate	Multiclone pressure drop	Scrubber downstream static pressure	Scrubber water pressure	Combination of firebox static pressure and induced draft fan speed setting
Data Collection Procedures	Data acquisition system records hourly total.	Manually recorded in the boiler operating log.	Manually recorded in the boiler operating log.	Manually recorded in the boiler operating log.	Manually recorded in the boiler log.
Averaging period <sup>1</sup>	1-hour average steaming rate.	Not to be exceeded at any time	Not to be exceeded at any time	Not to be exceeded at any time	Not to be exceeded at any time.

<sup>1</sup> The operating parameters are not to be deviated from at any time under normal operation. Periods of startup and shutdown are excluded.

<sup>2</sup> The statement regarding stability of digital pressure monitors was provided by BAF in December 7, 2007, Compliance Assurance Monitoring Design letter.

**[proposed] [40 CFR 64.6]**

## 3.14 40 CFR 64.7 - Operation of Approved Monitoring

(a) *Commencement of operation.* The owner or operator shall conduct the monitoring required under this part (i.e., 40 CFR 64) upon issuance of a part 70 or 71 permit (i.e., Tier I OP renewal) that includes such monitoring.

(b) *Proper maintenance.* At all times, the owner or operator shall maintain the monitoring equipment, including but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment.

(c) *Continued operation.* Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the Kipper boiler is operating. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities shall not be used for purposes of this part, including data averages and calculations, or fulfilling a minimum data availability requirement, if applicable. The owner or operator shall use all the data collected during all other periods in assessing the operation of the control device and associated control system. A monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions.

(d) *Response to excursions or exceedances.* (1) Upon detecting an excursion or exceedance, the owner or operator shall restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). Such actions may include initial inspection and evaluation, recording that operations returned to normal without operator action (such as through response by a computerized distribution control system), or any necessary follow-up actions to return operation to within the indicator range, designated condition, or below the applicable emission limitation or standard, as applicable.

(2) Determination of whether the owner or operator has used acceptable procedures in response to an excursion or exceedance will be based on information available, which may include but is not limited to, monitoring results, review of operation and maintenance procedures and records, and inspection of the control device, associated capture system, and the process.

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-2008.0109**

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No.:</b>	065-00008	<b>Date Issued:</b>	June 10, 2008
<b>Location:</b>	Rexburg, ID	<b>Date Expires:</b>	June 10, 2013		

(e) *Documentation of need for improved monitoring.* After approval of monitoring under this part, if the owner or operator identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the owner or operator shall promptly notify the permitting authority and, if necessary, submit a proposed modification to the part 70 or 71 permit (i.e., Tier I OP) to address the necessary monitoring changes. Such a modification may include, but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

[40 CFR 64.7]

### 3.15 **40 CFR 64.8 -Quality Improvement Plan (QIP) Requirements**

If it is determined that a Quality Improvement Plan is required based on a determination under §64.7(d)(2), the permittee shall comply with QIP requirements in accordance with 40 CFR 64.8.

[40 CFR 64.8]

## ***Performance Test Requirements***

### 3.16 **CO Performance Test**

Within 60 days of initially firing coal in the Kipper boiler as part of a wood-coal mixture, and at such other times as may be required by the Director, the permittee shall conduct a performance test to measure CO emissions from the Kipper boiler stack when firing a wood-coal mixture to demonstrate compliance with the CO emissions factor in Permit Condition 6.3. The test shall be conducted in accordance with the procedures outlined in 40 CFR 60, Appendix A, Method 10, or a DEQ-approved alternative. The initial performance test, and any subsequent performance tests conducted to demonstrate compliance, shall be performed in accordance with IDAPA 58.01.01.157. In addition, the following information shall be recorded during each performance test run and included in the performance test report:

- The boiler shall be operated at the worst case normal production rate during the performance test. A description of how this requirement was met shall be included in the performance test report;
- The measured CO emission rates shall be reported in units of pounds per hour. All calculations used to convert the test results into these units shall be provided in the test report; and
- The quantity of coal and the quantity of wood in the fuel mixture shall be reported by weight (in units of tons/hr) or by gross heat content (in units of MMBtu/hr and Btu/lb). The methods used to make these determinations shall be described.

[PTC Condition; IDAPA 58.01.01.211.04, 5/1/94; IDAPA 58.01.01.157, 4/5/00]

### 3.17 **PM Performance Tests**

No later than September 6, 2011, the permittee shall conduct a performance test to measure PM and PM<sub>10</sub> emissions from the Kipper boiler stack to demonstrate compliance with the PM emissions standard in Permit Condition 3.4 and the PM<sub>10</sub> emissions limit in Permit Condition 3.2.

In addition, within 60 days of commencing the firing of coal as part of a wood-coal mixture, the permittee shall conduct a performance test to measure PM and PM<sub>10</sub> emissions from the Kipper boiler stack to demonstrate compliance with the PM emissions standard in Permit Condition 3.4 and the PM<sub>10</sub> emissions limit in Permit Condition 3.2.

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-2008.0109**

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No.:</b>	065-00008	<b>Date Issued:</b>	June 10, 2008
<b>Location:</b>	Rexburg, ID	<b>Date Expires:</b>	June 10, 2013		

The tests shall be conducted in accordance with the procedures outlined in 40 CFR 60, Appendix A, Method 5 for PM emissions and Methods 5 and 202 for PM<sub>10</sub> emissions. The initial performance test, and any subsequent performance tests conducted to demonstrate compliance, shall be performed in accordance with IDAPA 58.01.01.157. In addition, the following information shall be recorded during each performance test run and included in the performance test report:

- The boiler steaming rate;
- The static air pressure and water pressure at the wet Ventri-Rod® scrubber;
- The pressure drop across the multiclone;
- The quantity of coal and the quantity of wood in the fuel mixture shall be reported separately, either by weight (in units of tons/hr) or by gross heat content (in units of MMBtu/hr and Btu/lb). The methods used to make these determinations shall be described.

The boiler shall be operated at the worst case normal production rate during the performance test. A description of how this requirement was met shall be included in the performance test report. Visible emissions shall be observed and recorded using the methods specified in IDAPA 58.01.01.625. In addition to correcting the Method 5 test results to 8% oxygen, the Method 5 results shall be corrected for altitude as required by IDAPA 58.01.01.680 to demonstrate compliance with the fuel burning equipment particulate matter standard.

After the initial performance test, future testing shall be performed according to the following schedule. If the PM emission rate measured in the most recent test is less than or equal to 75% of the emission standard in Permit Condition 3.4, the next test shall be conducted within five years of the test date. If the PM emission rate measured during the most recent performance test is greater than 75%, but less than or equal to 90%, of the emission standard in Permit Condition 3.5, the next test shall be conducted within two years of the test date. If the PM emission rate measured during the most recent performance test is greater than 90% of the emission standard in Permit Condition 3.4, the next test shall be conducted within one year of the test date.

[PTC Condition; IDAPA 58.01.01.211.04, 5/1/94; IDAPA 58.01.01.157, 4/5/00]

## ***Reporting Requirements***

### **3.18 Coal Combustion**

The permittee shall notify DEQ in writing of the following event within 5 working days after occurrence:

- Date of commencement of firing a wood-coal mixture in the Kipper boiler.

[PTC Condition; IDAPA 58.01.01.211.03, 5/1/94]

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-2008.0109**

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No.:</b>	065-00008	<b>Date Issued:</b>	June 10, 2008
<b>Location:</b>	Rexburg, ID	<b>Date Expires:</b>	June 10, 2013		

**3.19 40 CFR 64.9 -Reporting and Recordkeeping Requirements**

(a) *General reporting requirements.* (1) On and after the date specified in 40 CFR 64.7(a) by which the owner or operator must use monitoring that meets the requirements of this part (i.e., 40 CFR 64) the owner or operator shall submit monitoring reports to the permitting authority in accordance with 40 CFR 70.6(a)(3)(iii) (see General Provision 24).

(2) A report for monitoring under this part (i.e., 40 CFR 64) shall include, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the following information, as applicable:

- (i) Summary information on the number, duration and cause (including unknown cause, if applicable) of excursions or exceedances, as applicable, and the corrective actions taken;
- (ii) Summary information on the number, duration and cause (including unknown cause, if applicable) for monitor downtime incidents (other than downtime associated with zero and span or other daily calibration checks, if applicable); and
- (iii) (Not applicable until a Quality Improvement Plan is required.)

(b) *General recordkeeping requirements.* (1) The owner or operator shall comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). The owner or operator shall maintain records of monitoring data, monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under this part (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions).

(2) Instead of paper records, the owner or operator may maintain records on alternative media, such as microfilm, computer files, magnetic tape disks, or microfiche, provided that the use of such alternative media allows for expeditious inspection and review, and does not conflict with other applicable recordkeeping requirements.

**[40 CFR 64.9]**

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-2008.0109**

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No.:</b>	065-00008	<b>Date Issued:</b>	June 10, 2008
<b>Location:</b>	Rexburg, ID	<b>Date Expires:</b>		June 10, 2013	

**4. BOILERS 1 AND 2****4.1 Process Description**

Boilers 1 and 2 were manufactured by Erie City, are natural gas-fired, and have rated heat input capacities of 52 MMBtu/hr and 35 MMBtu/hr, respectively. Boilers 1 and 2 were installed prior to 1965.

Table 4.1 describes the devices used to control emissions from boilers no. 1 and no. 2

**Table 4.1 EMISSIONS UNITS AND EMISSIONS CONTROL DEVICES**

<b>Emissions Unit(s) / Process(es)</b>	<b>Emissions Control Device</b>
Boiler 1	None
Boiler 2	None

***Emissions Limits*****4.3 Fuel Burning Equipment – PM**

Particulate matter emissions from Boiler 1 and Boiler 2 shall not exceed 0.015 gr/dscf corrected to 3% oxygen when burning natural gas.

**[IDAPA 58.01.01.675, 5/1/94]**

**4.3 Boiler Annual Inspection and Maintenance**

At least once per calendar year or per a DEQ-approved schedule, the permittee shall tune and adjust the burner systems of Boilers 1 and 2 (Erie boilers) to maintain efficient combustion. The permittee shall maintain records of the boiler tuning conducted to comply with this Permit Condition. The records shall provide the date the tuning was conducted and a description of the adjustments made to the boiler to maintain combustion efficiency.

**[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]**

**4.4 Natural Gas Combustion Monitoring**

The permittee shall install, calibrate, maintain, and operate equipment to measure the quantity of natural gas combusted. The natural gas combustion data is used in the facility-wide CO emission calculation in Section 6 of this permit. The following quantities of natural gas combusted shall be monitored and recorded on a monthly basis in units of million standard cubic feet (MMscf) per month and MMscf per rolling 12-month period:

- Total gas combusted at the Rexburg facility
- Total gas combusted by Boilers 1 and 2

The quantity of gas combusted per rolling 12-month period shall be determined by adding the quantity of gas combusted for the month plus the quantity of gas combusted during the previous consecutive 11-month period.

**[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]**

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-2008.0109**

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No.:</b>	065-00008	<b>Date Issued:</b>	June 10, 2008
<b>Location:</b>	Rexburg, ID	<b>Date Expires:</b>	June 10, 2013		

**5. PROCESS A (DRYING PROCESS AND MATERIAL TRANSFER SYSTEMS)****5.1 Process Description**

The Basic American Foods Rexburg facility produces a variety of dehydrated food products for external customers and for internal use. Products include potato granules, formulated dehydrated food products, dehydrated whole and piece food products, and animal feed. Raw materials into the process are cooked potatoes, cooked foods, dehydrated foods, and additives, including sulfites. The processes addressed by this section are listed in Table 5.1 and include coolers, dryers, dehydration lines, and material transfer systems. Emissions of PM from each of these sources are uncontrolled. Material Recovery Units (MRUs), in the form of cyclones and fabric filters, are integral process equipment used to separate the pneumatically conveyed product from the air stream. Drying heat is provided by both natural gas combustion and steam produced by the plant boilers. Process A was constructed in the early 1960's.

**Table 5.1 PROCESS A EMISSIONS UNIT DESCRIPTION**

Emissions Unit No. / Process	Emissions Control Device	Emissions Point
<b>PROCESS A</b>		
Cooler/Dryer 7020 (Cooler vent)	None	7020
Cooler/Dryer 7101 (Dryer, 6.5 MMBtu/hr, natural gas-fired)	None	7101
Cooler/Dryer 7102 (Dryer, 6.5 MMBtu/hr, natural gas-fired)	None	7102
Cooler/Dryer 7019 (Dryer, 6.6 MMBtu/hr, steam and natural gas)	None	7019
Cooler/Dryer 7001 (Dryer, steam-heated)	None	7001
Cooler/Dryer 7027 (Cooler)	None	7027
Material Recovery Unit 7006	None	7006

***Emissions Limits*****5.2 PM<sub>10</sub> Emission Limits**

Emissions of PM<sub>10</sub> from the drying process and material transfer system stacks shall not exceed any corresponding emissions rate limits listed in the following table.

**Table 5.2 DRYER PROCESS AND MATERIAL TRANSFER SYSTEM PM<sub>10</sub> EMISSIONS LIMITS**

Source Description	PM <sub>10</sub> Emissions Limits (24-hr average)
Cooler/Dryer stack 7101	2.2 lb/hr
Cooler/Dryer stack 7102	2.2 lb/hr
Cooler/Dryer stack 7019	3.4 lb/hr

[PTC Condition; IDAPA 58.01.01.203.02, 5/1/94; IDAPA 58.01.01.211.01, 5/1/94]

***Operating Requirements*****5.3 Throughput Limits**

The production of dried products, including additives, from Process A shall not exceed 61 tons per 24-hour work day.

[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]



**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-2008.0109**

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No.:</b>	065-00008	<b>Date Issued:</b>	June 10, 2008
<b>Location:</b>	Rexburg, ID	<b>Date Expires:</b>	June 10, 2013		

**5.4 Dryer Fuels**

Each dryer shall combust only natural gas or be heated by steam from the plant boilers.

**[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]**

**5.5 Process Identification**

Process line A shall be identified by one or more signs posted on or near the process line. Each cooler or dryer shall also be identified in a manner that will allow an inspector to identify the equipment that corresponds to the equipment listed in Table 5.1.

**[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]**

***Monitoring, Recordkeeping and Reporting Requirements***

**5.6 Throughput Monitoring**

The permittee shall monitor and record, on a daily basis, the calendar date and the total product output of dried food products including additives, in tons per day, from Process A.

**[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]**

**5.7 PM<sub>10</sub> Performance Test for Cooler/Dryer 7101 or 7102**

Within 180 days of June 10, 2008, the permittee shall conduct a performance test to measure PM<sub>10</sub> emissions, in pounds per hour, from the stack of Cooler/Dryer 7101 or 7102 to demonstrate compliance with Permit Condition 5.2. The test shall be conducted in accordance with the procedures outlined in EPA Methods 5 and 202, or Methods 201a and 202. This performance test, and any subsequent tests, shall be performed in accordance with IDAPA 58.01.01.157. In addition, the following information shall be recorded during each performance test run and included in the performance test report:

- The Cooler/Dryer shall be operated at the worst case normal production rate during the performance test. A description of how this requirement was met shall be included in the performance test report;
- Visible emissions shall be observed during each performance test run using the methods specified in IDAPA 58.01.01.625;
- The process output from the Cooler/Dryer shall be recorded in pounds per hour; and
- The burner firing rate of the Cooler/Dryer shall be recorded in MMBtu/hr.

**[proposed][PTC Condition; IDAPA 58.01.01.211.04, 5/1/94; IDAPA 58.01.01.157, 4/5/00]**

**5.8 PM<sub>10</sub> Performance Test for Cooler/Dryer 7019**

Within 180 days of June 10, 2008, the permittee shall conduct a performance test to measure PM<sub>10</sub> emissions, in pounds per hour, from the stack of Cooler/Dryer 7019 to demonstrate compliance with Permit Condition 5.2. The test shall be conducted in accordance with the procedures outlined in EPA Methods 5 and 202, or Methods 201a and 202. This performance test, and any subsequent tests, shall be performed in accordance with IDAPA 58.01.01.157. In addition, the following information shall be recorded during each performance test run and included in the performance test report:

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-2008.0109**

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No.:</b> 065-00008	<b>Date Issued:</b>	June 10, 2008
<b>Location:</b>	Rexburg, ID		<b>Date Expires:</b>	June 10, 2013

- The Cooler/Dryer shall be operated at the worst case normal production rate during the performance test. A description of how this requirement was met shall be included in the performance test report;
- Visible emissions shall be observed during each performance test run using the methods specified in IDAPA 58.01.01.625;
- The process output from the Cooler/Dryer shall be recorded in pounds per hour; and
- The burner firing rate of the Cooler/Dryer shall be recorded in MMBtu/hr or scf/hr.  
[proposed][PTC Condition; IDAPA 58.01.01.211.04, 5/1/94; IDAPA 58.01.01.157, 4/5/00]

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-2008.0109**

<b>Permittee:</b> Basic American Foods	<b>Facility ID No.:</b> 065-00008	<b>Date Issued:</b> June 10, 2008
<b>Location:</b> Rexburg, ID		<b>Date Expires:</b> June 10, 2013

## 6. PROCESS B (DRYING PROCESS AND MATERIAL TRANSFER SYSTEMS)

### 6.1 Process Description

The Basic American Foods Rexburg facility produces a variety of dehydrated food products for external customers and for internal use. Products include potato granules, formulated dehydrated food products, dehydrated whole and piece food products, and animal feed. Raw materials into the process are cooked potatoes, cooked foods, dehydrated foods, and additives, including sulfites. The processes addressed by this section are listed in Table 6.1 and include coolers, dryers, dehydration lines, and material transfer systems. Emissions of PM from each of these sources are uncontrolled. Material Recovery Units (MRUs), in the form of cyclones and fabric filters, are integral process equipment used to separate the pneumatically conveyed product from the air stream. Drying heat is provided by both natural gas combustion and steam produced by the plant boilers.

**Table 6.1 PROCESS B EMISSIONS UNIT DESCRIPTIONS**

Emissions Unit No. / Process	Emissions Control Device	Emissions Point
<b>PROCESS B</b>		
Material Recovery Unit 5034	None	5034
Cooler/Dryer 5037 (Cooler/dryer vent, dryer is steam heated)	None	5037
Cooler/Dryer 4000 (Dryer, steam heated)	None	4000
Cooler/Dryer 234/228 (Dryer, natural gas-fired, 16.1 MMBtu/hr)	None	234/228
Cooler/Dryer 410/411 (Dryer vent, steam-heated)	None	410/411
Cooler/Dryer 311, 312 (Dryer vent, steam-heated)	None	311, 312
Cooler/Dryer 638 (Dryer vent, steam-heated)	None	638
Cooler/Dryer 613/614 (Dryer vent, steam heated)	None	613/614
Cooler/Dryer 615/616 (Dryer vent, steam heated)	None	615/616
Material Recovery Unit 707 (fabric filter)	None	707
Material Recovery Unit 725 (fabric filter)	None	725
Material Recovery Unit 8 (fabric filter)	None	8
Material Recovery Unit 5001	None	5001
Material Recovery Unit 5000 (fabric filter)	None	5000
Material Recovery Unit 432 (fabric filter)	None	432
Material Recovery Unit 322	None	322
Material Recovery Unit 572 (Vent from material recovery cyclone in animal feed load-out system)	None	572

## **Emissions Limits**

### 6.2 PM<sub>10</sub> Emission Limits

Emissions of PM<sub>10</sub> from the drying process and material transfer system stacks shall not exceed any corresponding emissions rate limits listed in the following table.

**Table 6.2 DRYER PROCESS AND MATERIAL TRANSFER SYSTEM PM<sub>10</sub> EMISSIONS LIMITS<sup>a</sup>**

Source Description	PM <sub>10</sub> Emissions Limits (24-hr average)
For each of the following Cooler/Dryer 3-stack groups, the arithmetic average of the emission rates from the combined 3 stacks in the group shall not exceed the listed emission limit:	
Stack group 4000, 228, and 234	3.2 lb/hr
Stack group 311, 312, and 410/411	1.2 lb/hr
Stack group 613/614, 615/616, and 638	2.2 lb/hr

**[PTC Condition; IDAPA 58.01.01.203.02, 5/1/94; IDAPA 58.01.01.211.01, 5/1/94]**

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-2008.0109**

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No.:</b>	065-00008	<b>Date Issued:</b>	June 10, 2008
<b>Location:</b>	Rexburg, ID	<b>Date Expires:</b>	June 10, 2013		

***Operating Requirements*****6.3 Throughput Limits**

The total production of dried products, including additives, from Process B shall not exceed 304 tons per 24-hour work day.

[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]

**6.4 Dryer Fuels**

Each dryer shall combust only natural gas or be heated by steam from the plant boilers.

[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]

**6.5 Process Identification**

Process line B shall be identified by one or more signs posted on or near the process line. Each cooler or dryer shall also be identified in a manner that will allow an inspector to identify the equipment that corresponds to the equipment listed in Table 6.1.

[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]

***Monitoring, Recordkeeping and Reporting Requirements*****6.6 Throughput Monitoring**

The permittee shall monitor and record, on a daily basis, the calendar date and the total product output of dried food products including additives, in tons per day, from Process B.

[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]

**6.7 PM<sub>10</sub> Performance Test for Cooler/Dryer: 228, 234, 311; 312, 4000, 410/411; 613/614, 615/616, 638**

Within 180 days of June 10, 2008, the permittee shall conduct performance tests to measure the PM<sub>10</sub> emission rates, in pounds per hour, from the stacks of one of the following 3-stack groups to demonstrate compliance with Permit Condition 4.2: 4000, 228, and 234; 311, 312, and 410/411; or 613/614, 615/616, and 638. For purposes of demonstrating compliance with Permit Condition 6.2, the arithmetic average of the emission rates from the combined 3 stacks in the 3-stack group tested shall not exceed the corresponding emissions limit in Table 6.2, based on the average of three test runs. The test shall be conducted in accordance with the procedures outlined in EPA Methods 5 and 202, or Methods 201a and 202. This performance test, and any subsequent tests, shall be performed in accordance with IDAPA 58.01.01.157. In addition, the following information shall be recorded during each performance test run and included in the performance test report:

- The Cooler/Dryer shall be operated at the worst case normal production rate during the performance test. A description of how this requirement was met shall be included in the performance test report;
- Visible emissions shall be observed during each performance test run using the methods specified in IDAPA 58.01.01.625;
- The process output from the Cooler/Dryer shall be recorded in pounds per hour; and
- If the Cooler/Dryer has a burner, the natural gas firing rate shall be recorded in MMBtu/hr or scf/hr.

[proposed][PTC Condition; IDAPA 58.01.01.211.04, 5/1/94; IDAPA 58.01.01.157, 4/5/00]

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-2008.0109**

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No.:</b>	065-00008	<b>Date Issued:</b>	June 10, 2008
<b>Location:</b>	Rexburg, ID	<b>Date Expires:</b>	June 10, 2013		

**7. PLANT SPACE HEATERS****7.1 Process Description**

The BAF Rexburg Facility has numerous space heaters ranging in size from less than 100,000 Btu/hr to 8.8 MMBtu/hr, with a total combustion capacity of 30.8 MMBtu/hr. Most of the units provide direct heating; i.e., the combustion air from the unit is discharged directly into the room to provide heating.

***Emissions Limits***

There are no emission limits specifically applicable to the plant space heaters. Emissions from plant space heaters are regulated as part of the facility-wide Carbon Monoxide Emissions Limit in Permit Condition 8.1.

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-2008.0109**

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No.:</b>	065-00008	<b>Date Issued:</b>	June 10, 2008
<b>Location:</b>	Rexburg, ID	<b>Date Expires:</b>	June 10, 2013		

**8. CARBON MONOXIDE EMISSIONS LIMIT****8.1 Carbon Monoxide Emissions Limit**

- 8.1.1 The CO emissions from the BAF facility shall not exceed 249 tons per year from aggregated emissions sources.

[PTC Condition; IDAPA 58.01.01.203.01, 5/1/94; IDAPA 58.01.01.211.01, 5/1/94]

***Monitoring and Recordkeeping Requirements*****8.2 Carbon Monoxide Emissions Limit Compliance**

- 8.2.1 For all combustion sources, BAF shall calculate and record rolling 12-month total CO emissions based on steam production and coal consumption for the boilers and natural gas consumption for the process dryers and space heaters. The CO compliance demonstration shall use emission factors developed through performance testing for the Kipper boiler and process dryers. BAF shall use AP-42 emissions factors for natural gas combustion to determine CO emissions for Boiler 1 and Boiler 2. Gas combusted in the plant space heaters shall be included with the process gas usage. Monthly calculations of actual emissions shall be used to determine rolling 12-month total emissions to demonstrate compliance with the annual emission limit in Permit Condition 8.1. Records shall be maintained onsite for a period of at least five years and shall be made available to DEQ representatives upon request.

[proposed][PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]

**8.3 CO Emissions**

The permittee shall monitor and record on a monthly basis the CO emission rate from the BAF Rexburg facility in tons per rolling 12-month period. The quantity of CO emissions shall be determined using the following equation:

$$E_{CO} = EF_{KB} * B_{SP} + [EF_P * (G_T - G_B)] + (EF_B * G_B)$$

Where:  $E_{CO}$  = Facility CO emission rate in tons for the consecutive 12-month period

$EF_{KB}$  = Emission factor for Kipper boiler CO. The permittee shall use 0.464 tons CO/million pounds of steam, or a DEQ-approved alternative factor approved in writing.

$B_{SP}$  = Kipper boiler steam production in millions of pounds. Example - for 5,587,000 pounds of steam production in a rolling 12-month period, use 5.587.

$EF_P$  = Emission factor for natural gas used in the process. That is, CO emission factor for all natural gas combustion units at the facility except the boilers. The permittee shall use 0.133 ton/MMscf of natural gas, or a DEQ-approved alternative factor approved in writing.

$G_T$  = Total natural gas combusted at the Rexburg facility in the last 12-months; MMscf

$G_B$  = Total natural gas combusted in the Boilers 1 and 2 in the last 12 months; MMscf

$EF_B$  = Emission factor for natural gas used in Boilers 1 and 2. The permittee shall use 0.042 ton/MMscf, or a DEQ-approved alternative factor approved in writing.

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-2008.0109**

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No.:</b>	065-00008	<b>Date Issued:</b>	June 10, 2008
<b>Location:</b>	Rexburg, ID	<b>Date Expires:</b>	June 10, 2013		

After performance testing for CO emissions is conducted with coal firing per Permit Condition 3.16, the Permittee shall revise this equation to include a term for CO emissions during coal combustion. The revised equation shall be submitted to DEQ for review and approval prior to being used to calculate CO emissions.

**[PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]**

***Reporting Requirements*****8.4     Reporting**

- 8.4.1     Once per annum, BAF shall report to DEQ the rolling 12-month total CO emissions recorded under Permit Conditions 8.2 and 8.3. The report shall be for the period January 1<sup>st</sup> through December 31<sup>st</sup> and shall be due on or before March 1<sup>st</sup> of each calendar year. All reports must be certified in accordance with IDAPA 58.01.01.123.

**[proposed][PTC Condition; IDAPA 58.01.01.211.01, 5/1/94]**

# AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-2008.0109

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No.:</b>	065-00008	<b>Date Issued:</b>	June 10, 2008
<b>Location:</b>	Rexburg, ID	<b>Date Expires:</b>	June 10, 2013		

## 9. SUMMARY OF EMISSION RATE LIMITS

Table 9.1 provides a summary of all emission rate limits required by this permit.

**Table 9.1 SUMMARY OF EMISSION RATE LIMITS**

Basic American Foods, Rexburg Emissions Limits <sup>a</sup> – Hourly (lb/hr) and Annual <sup>b</sup> (T/yr)				
Source Description	CO	SO <sub>2</sub>	PM <sub>10</sub> <sup>c</sup>	
	T/yr	T/yr	---	T/yr
Kipper Boiler	---	214	16.3 lb/hr	71.2
Boilers No. 1 and No. 2	---	---	---	
Cooler/Dryers; Average emission rate from each 3-stack group: Stacks 4000, 228, and 234	---	---	3.2 lb/hr	---
Stacks 311, 312, and 410/411			1.2 lb/hr	
Stacks 613/614, 615/616, and 638			2.2 lb/hr	
Cooler/Dryer 7101	---	---	2.2 lb/hr	---
Cooler/Dryer 7102	---	---	2.2 lb/hr	---
Cooler/Dryer 7019	---	---	3.4 lb/hr	---
Facility-Wide limit	249	---	---	---

<sup>a</sup> As determined by a pollutant-specific EPA reference method, DEQ-approved alternative, or as determined by DEQ's emissions estimation methods used in the permit analysis.

<sup>b</sup> As determined by multiplying the actual or allowable (if actual is not available) pound per hour emission rate by the allowable hours per year that the process(es) may operate(s), or by actual annual production rates.

<sup>c</sup> Includes condensable PM.



**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-2008.0109**

<b>Permittee:</b> Basic American Foods	<b>Facility ID No.:</b> 065-00008	<b>Date Issued:</b> June 10, 2008
<b>Location:</b> Rexburg, ID		<b>Date Expires:</b> June 10, 2013

**10. PERMIT TO CONSTRUCT AND TIER II PERMIT TO OPERATE GENERAL PROVISIONS**

***General Compliance***

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit, the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act.

**[Idaho Code §39-101, et seq.]**

2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

**[IDAPA 58.01.01.211, 405, 5/1/94]**

3. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.

**[IDAPA 58.01.01.212.01, 406, 5/1/94]**

***Inspection and Entry***

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
  - a. Enter upon the permittee's premises where a Tier I source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
  - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
  - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
  - d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

**[Idaho Code §39-108]**

***Construction and Operation Notification***

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
  - a. A notification of the date of initiation of construction, within five working days after occurrence;
  - b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-2008.0109**

<b>Permittee:</b>	Basic American Foods	<b>Facility ID No.:</b> 065-00008	<b>Date Issued:</b>	June 10, 2008
<b>Location:</b>	Rexburg, ID		<b>Date Expires:</b>	June 10, 2013

- c. A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211, 5/1/94]

***Performance Testing***

6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

***Monitoring and Recordkeeping***

7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 405, 5/1/94]

**AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-2008.0109**

<b>Permittee:</b> Basic American Foods	<b>Facility ID No.:</b> 065-00008	<b>Date Issued:</b> June 10, 2008
<b>Location:</b> Rexburg, ID		<b>Date Expires:</b> June 10, 2013

***Excess Emissions***

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.  
[IDAPA 58.01.01.130-136, 4/5/00]

***Certification***

9. All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.  
[IDAPA 58.01.01.123, 5/1/94]

***False Statements***

10. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.  
[IDAPA 58.01.01.125, 3/23/98]

***Tampering***

11. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.  
[IDAPA 58.01.01.126, 3/23/98]

***Expiration and Renewal***

12. This permit shall be renewable on the expiration date, provided the permittee submits an application for renewal to the Department and continues to meet all terms and conditions contained in the permit. The expiration of this permit will not affect the operation of the stationary source or facility during the administrative procedure period associated with the permit renewal process.  
[IDAPA 58.01.01.209.04, 7/1/02]

***Transferability***

13. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06 and 404.05.  
[IDAPA 58.01.01.209.06, 404.05, 4/11/06]

***Severability***

14. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.  
[IDAPA 58.01.01.322.15.h, 5/1/94; 40 CFR 70.6(a)(5)]